

NOTICE OF AMENDMENT

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

March 26, 1997

Matt Gillis, Vice President of Operations
Northwest Pipeline Corporation
295 Chipeta Way
P.O. Box 58900
Salt Lake City, UT 84158-0900

CPF No. 57104-M

Dear Mr. Gillis:

On March 17-19, 1997, a representative of the Western Region, Office of Pipeline Safety, pursuant to Chapter 601 of 49 United States Code, conducted an on-site pipeline safety inspection of your Operations & Maintenance Manuals in Salt Lake City, Utah.

As a result of the inspection, it appears that you have committed a probable violation, as noted below, of Pipeline Safety Regulations Title 49, Code of Federal Regulations, Part 192. The item inspected and probable violation is:

- 1. §192.605 Each operator shall include the following in its operating and maintenance plan:**
 - (b) Maintenance and normal operations. The manual required by paragraph(a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations;**
 - (2) Controlling corrosion in accordance with the operations and maintenance requirements of Subpart I of this part.**
 - (a) §192.467 External corrosion control: Electrical isolation.**
 - (c) Except for unprotected copper inserted in a ferrous pipe, each pipeline must be electrically isolated from metallic casings that are a part of the underground system. However, if isolation is not achieved because it is impractical, other measures must be taken to minimize corrosion of the pipeline inside the casing.**

At the time of the inspection, Northwest Pipeline Corporation (NWPL) did not have proper shorted casing procedures. Although NWPL Operations & Maintenance Manual addressed shorted casings, the shorted casing procedure did not include procedures for the course of action NWPL would take to correct or negate the effects of the shorts within six months of discovery. NWPL's procedures must be expanded to include this topic.

Regarding the deficiencies in your written procedures for operations, maintenance, and emergencies, the Office of Pipeline Safety is issuing you a Notice of Amendment requiring that your procedures be amended to comply with the requirements of the regulations referenced.

As provided in 49 C.F.R. §190.237, this notice serves as your notification that this office considers your procedures/plans inadequate. Under 49 C.F.R. § 190.237, you have a right to submit written comments or request an informal hearing. You must submit written comments or a request for a hearing within 30 days of receiving this notice. After reviewing the record, the Associate Administrator for Pipeline Safety will determine whether your plans or procedures are adequate. The criteria used in making this determination are outlined in 49 C.F.R. § 190.237. If you do not wish to contest this notice, please provide your revised procedures within 30 days of receiving this notice.

When appropriate procedures have been prepared, submit them to the Director, Western Region, Office of Pipeline Safety, Research and Special Programs Administration, 12600 W. Colfax Avenue, Suite A-250, Lakewood, Colorado 80215-3736. Please refer to **CPF No. 57104-M** in any correspondence or communication pertaining to this matter.

Sincerely,

Edward J. Ondak
Director